

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PUERTO RICO TELEPHONE COMPANY,
INC.,

Plaintiff,

v.

SAN JUAN CABLE LLC d/b/a ONELINK
COMMUNICATIONS,

Defendant.

Civil No. 11-2135-GAG-BJM

**PLAINTIFF’S MOTION TO RESTRICT ACCESS TO EXHIBITS 1 AND 6 TO
PLAINTIFF’S OPPOSITION TO DEFENDANT’S URGENT MOTION FOR ORDER
BARRING PLAINTIFF FROM RELYING ON OR USING THE UNAUTHORIZED
SUPPLEMENTAL REPORT OF J. GREGORY SIDAK**

Plaintiff Puerto Rico Telephone Company(“PRTC”), by and through undersigned counsel, hereby moves the Court for entry of an order restricting access to exhibits 1 and 6 attached to its Plaintiff’s Opposition to Defendant’s Urgent Motion (Dkt. No. 236).

On December 3, 2013, OneLink filed its Motion (Dkt. No. 234). OneLink did not attach a copy of the Supplemental Expert Report at issue to its Motion. PRTC’s Opposition (Dkt. No. 236) refers to and attaches Mr. Sidak’s Supplemental Report as Exhibit 1, as well as relevant portions of Mr. Sidak’s Deposition as Exhibit 6. Both the Supplemental Report and deposition contain information marked “Highly Confidential – OCCO” pursuant to the Stipulated Protective Order Concerning Confidentiality entered in this case, (Dkt. No. 62), which requires that “[a]ll Confidential Information or Highly Confidential Information – OCCO filed with the Court shall be filed under seal pursuant to the procedures set forth in Fed. R. Civ. P. 5.2(d) and L.Cv.R. 5.2.” (Protective Order at ¶ 20.).

WHEREFORE, Plaintiff respectfully requests that this Honorable Court allow the filing of Exhibits 1 and 6 to be restricted as an *ex parte* filing and under seal, pursuant to Standing Order No. 9, Misc. No. 03-149(ADC), and be filed under seal, pursuant to FED. R. CIV. P. 5.2(d).

DATED: December 5, 2013

Respectfully submitted,

/s/ Dylan M. Carson

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Counsel for Plaintiff Puerto Rico Telephone Company, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2013, a copy of the foregoing plaintiff's **PLAINTIFF'S MOTION TO RESTRICT ACCESS TO EXHIBITS 1 AND 6 TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S URGENT MOTION FOR ORDER BARRING PLAINTIFF FROM RELYING ON OR USING THE UNAUTHORIZED SUPPLEMENTAL REPORT OF J. GREGORY SIDAK** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system, including:

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